

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
2 Charles K. Verhoeven (Bar No. 170151)  
3 charlesverhoeven@quinnemanuel.com  
4 David A. Perlson (Bar No. 209502)  
5 davidperlson@quinnemanuel.com  
6 Melissa Baily (Bar No. 237649)  
7 melissabaily@quinnemanuel.com  
8 John Neukom (Bar No. 275887)  
9 johnneukom@quinnemanuel.com  
10 Jordan Jaffe (Bar No. 254886)  
11 jordanjaffe@quinnemanuel.com  
12 50 California Street, 22<sup>nd</sup> Floor  
13 San Francisco, California 94111-4788  
14 Telephone: (415) 875-6600  
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO UBER'S MOTION FOR RELIEF  
FROM NON-DISPOSITIVE ORDER RE:  
WAYMO'S MOTION TO COMPEL**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal information in its July 21, 2017 Opposition to Uber’s Motion for Relief from Nondispositive  
 8 Order Re: Waymo’s Motion to Compel (the “Administrative Motion”). The Administrative Motion  
 9 seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s July 21, 2017 Opposition to Uber’s Motion for Relief from Nondispositive Order Re: Waymo’s Motion to Compel (“Waymo’s Opposition”)	Portions highlighted in blue	Defendants
	Portions highlighted in green	Waymo

15       3. Waymo has filed portions of Waymo’s Opposition (portions highlighted in blue) under  
 16 seal because they contain information that Defendants have designated confidential. Waymo expects  
 17 Defendants to file one or more declarations in accordance with the Local Rules.

18       4. Waymo’s Opposition also contains or refers to trade secret and confidential business  
 19 information, which Waymo seeks to seal. Portions of Waymo’s Opposition (portions highlighted in  
 20 green) contain, reference, and/or describe Waymo’s asserted trade secrets. Specifically, the  
 21 highlighted portions describe proprietary information gathered from technical leads across the entire  
 22 self-driving program, including descriptions and names of software, company goals for its technical  
 23 development, specific technical design goals, and identification of risks. I understand that these trade  
 24 secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s  
 25 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors  
 26 access to in-depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle  
 27 system. If such information were made public, I understand that Waymo’s competitive standing  
 28

1 would be significantly harmed. Waymo's request to seal is narrowly tailored to only the confidential  
2 information.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
4 true and correct, and that this declaration was executed in San Francisco, California, on July 21, 2017.

5 By /s/ Lindsay Cooper  
6 Lindsay Cooper  
7 Attorneys for WAYMO LLC  
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1 **SIGNATURE ATTESTATION**

2 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Lindsay Cooper.

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5 */s/ Charles K. Verhoeven*  
6 Charles K. Verhoeven  
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